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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TRI-VALLEY CARES,)	No. C 08-5408 SC
)	
Plaintiff,)	STIPULATION TO BRIEFING; and
)	[Proposed] ORDER
)	
v.)	
)	
UNITED STATES DEPARTMENT OF)	Date: July 23, 2010
ENERGY and NATIONAL NUCLEAR)	Time: 10:00 a.m.
SECURITY ADMINISTRATION,)	
)	
Defendants.)	

Plaintiff, Tri-Valley Cares, and defendants, the United States Department of Energy ("DOE"), and the National Nuclear Security Administration ("NNSA"), by and through their counsel of record, hereby stipulate, subject to the approval of the Court, to the following:

Stipulation to Briefing
C 08-5408 SC

1 1. On March 18, 2010, the Court set a schedule for the parties in which the initial round of
2 summary judgment briefing was set to begin on April 16, 2010.

3 2. The parties have subsequently discovered possible avenues for settlement, which if
4 successful, would obviate the need for further litigation.

5 3. The parties seek a 90-day period to attempt to settle this matter, and respectfully request
6 that the Court move the current briefing schedule and hearing date forward accordingly.

7 Plaintiff's Motion for Summary Judgment: July 15, 2010.

8 Defendants' Cross-Motion and Opposition: August 16, 2010

9 Plaintiff's Cross-Opposition and Reply: September 15, 2010

10 Defendants' Reply: October 7, 2010

11 Hearing: October 22, 2010 at 10:00 a.m.

12 Dated: April 15, 2010

Respectfully submitted,

13 JOSEPH P. RUSSONIELLO
14 United States Attorney

15 /s/
16 ILA C. DEISS
17 Assistant United States Attorney
Attorney for Defendants

18 ISAAC CAMPBELL
19 Trial Attorney
United States Department of Justice

20 Dated: April 15, 2010

21 /s/
22 SCOTT J. YUNDT
Attorney for Plaintiff

23 **ORDER**

24 Pursuant to the stipulation, IT IS SO ORDERED.

25
26 Date: 4/20/10

27 SAMUEL
United States



28 Stipulation to Briefing
C 08-5408 SC